

BROMBERG LAW LLC

Yael Bromberg, Esq., Principal\*  
Brett M. Pugach, Esq., of Counsel\*\*

43 West 43<sup>rd</sup> Street, Suite 32  
New York, NY 10036-7424

T: (212) 859-5083 | F: (201) 586-0427

P.O. Box 1131  
Glen Rock, NJ 07452-1131

July 29, 2022

**VIA ELECTRONIC FILING**

Hon. Tonianne J. Bongiovanni, U.S.M.J.  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Court Room 7W  
Trenton, NJ 08608

**RE: Conforti v. Hanlon, Case 3:20-cv-08267-ZNQ -TJB**  
**Request for Extension of Time to Respond to CCDC Motion to Intervene**

Dear Judge Bongiovanni:

This firm represents the Plaintiffs in the above-captioned matter. Currently pending before the Court are two Motions to Intervene. The first Motion to Intervene was filed by the Camden County Democrat Committee (“CCDC”) on July 21, 2022, making that motion returnable on August 15, 2022. The second Motion to Intervene was filed by the Regular Democratic Organization of Union County, Inc. (“RDOUC”) on July 25, 2022, making that motion returnable on September 6, 2022. Both Motions to Intervene address many similar issues such that an omnibus response from Plaintiffs would help to streamline the efforts of counsel and of the Court. In light of these considerations and having graciously obtained the consent of both the CCDC and the RDOUC, Plaintiffs are respectfully requesting (1) that the Court grant us an adjournment of one motion cycle with respect to the CCDC’s Motion to Intervene, such that both the CCDC and RDOUC Motions to Intervene can be treated on the same motion schedule with a common return date of September 6, 2022 and with opposition and replies due in accordance with the Local Rules; and (2) that Plaintiffs be permitted to file an omnibus response to both Motions to Intervene in the same opposition brief. No other requests for adjournment have been made or granted with respect to the CCDC and RDOUC Motions to Intervene. We have attached a proposed consent order reflecting the proposed schedule.

Thank you for the Court’s consideration of this matter.

Respectfully submitted,

/s/ Brett M. Pugach  
Brett M. Pugach, Esq.  
Yael Bromberg, Esq.  
BROMBERG LAW LLC

-and-

\* Licensed to practice in New Jersey, New York, and the District of Columbia

\*\* Licensed to practice in New Jersey and New York

BROMBERG LAW LLC

Hon. Tonianne J. Bongiovanni, U.S.M.J.

July 29, 2022

Page 2

Flavio L. Komuves, Esq.  
WEISSMAN & MINTZ

*Counsel for Plaintiffs*

CC. All Counsel of Record (via electronic filing)